

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Bradley Dale Weldon

Debtor

Chapter: 13

Case No. 16-11528-mdc

**OBJECTION OF BANK OF AMERICA, N.A.  
TO DEBTOR'S CHAPTER 13 PLAN**

AND NOW COMES, Bank of America, N.A. ("Mortgagee"), secured creditor and mortgage lien holder on premises owned by Debtor and located at 118 Wayne Avenue Norristown, PA 19401, by its attorneys, Udren Law Offices, P.C., who hereby avers as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on Debtor's real property as set forth above.

2. Debtor filed the instant Chapter 13 Bankruptcy Petition on March 7, 2016.

3. Mortgagee will file a Proof of Claim on or before the bar date set by the court.

4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had estimated mortgage arrears of \$4,386.07 and an estimated total debt to claim in the amount of \$53,993.36.

5. Debtor's proposed Chapter 13 Plan does not provide for payment of mortgage arrears does not provide for the full claim, or the proper interest rate and monthly mortgage payment per the terms of the Note and Mortgage.

6. Debtor's proposed Chapter 13 Plan does not provide for the Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. 1325(a)(5)(B)(ii).

WHEREFORE, Bank of America, N.A. prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan.

By: /s/ David Neeren, Esquire

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